

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EUGENE WESTMORELAND,)
individually and for a class,)
)
Plaintiff,)
)
v.) No. 1:23-cv-01851
)
THOMAS DART, SHERIFF OF COOK)
COUNTY, and COOK COUNTY,)
ILLINOIS,)
)
Defendants.)
_____)

The deposition of EFFERSON YARNELL WILLIAMS,
taken on behalf of the defendants in the above-
entitled case before Debra L. Kleszyk, a Certified
Shorthand Reporter within and for the State of
Illinois, taken remotely via videoconference on
April 25, 2024, commencing at 11:16 a.m., pursuant
to the Federal Rules of Civil Procedure. The
witness was located at Cook County Correctional
Center, 2700 South California Avenue, Chicago,
Illinois.

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 THOMAS G. MORRISSEY LTD.</p> <p>4 BY: MR. PATRICK W. MORRISSEY</p> <p>5 10257 South Western Avenue</p> <p>6 Chicago, Illinois 60643</p> <p>7 (773) 233-7900</p> <p>8 pwm@morrisseylawchicago.com</p> <p>9</p> <p>10 Appeared via videoconference on behalf of</p> <p>11 the plaintiff</p> <p>12</p> <p>13 DeVORE RADUNSKY, LLC</p> <p>14 BY: MR. ZACHARY STILLMAN</p> <p>15 230 West Monroe Street, Suite 230</p> <p>16 Chicago, Illinois 60606</p> <p>17 (312) 300-4479</p> <p>18 zstillman@devoreradunsky.com</p> <p>19 Appeared via videoconference on behalf of</p> <p>20 the defendants</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 THE COURT REPORTER: My name is</p> <p>2 Debbie Kleszyk. I am an Illinois Certified</p> <p>3 Shorthand Reporter.</p> <p>4 The parties participating in this</p> <p>5 deposition acknowledge that I am not physically</p> <p>6 present in the room with the witness and that I</p> <p>7 will be reporting this deposition remotely. At</p> <p>8 this time I ask counsel to identify yourself and</p> <p>9 then indicate your stipulation to waive any</p> <p>10 objections to the validity of the oath adminis-</p> <p>11 tered remotely, starting with the noticing</p> <p>12 attorney.</p> <p>13 MR. STILLMAN: Zachary Stillman with</p> <p>14 DeVore Radunsky for defendants, Sheriff and</p> <p>15 County. And we waive any objections.</p> <p>16 MR. MORRISSEY: And my name is</p> <p>17 Pat Morrissey. I represent Mr. Westmoreland, and</p> <p>18 I also represent Mr. Williams in this deposition.</p> <p>19 I stipulate.</p> <p>20 (The witness was duly</p> <p>21 sworn.)</p> <p>22 EFFERSON YARNELL WILLIAMS,</p> <p>23 called as a witness herein, having been</p> <p>24 first duly sworn, was examined and</p> <p>25 testified as follows:</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2</p> <p>3 WITNESS: EFFERSON WILLIAMS</p> <p>4 EXAMINATION PAGE</p> <p>5 By Mr. Stillman 5, 48</p> <p>6 By Mr. Morrissey 44, 52</p> <p>7</p> <p>8</p> <p>9 INDEX OF EXHIBITS</p> <p>10 EXHIBIT DESCRIPTION PAGE</p> <p>11 Exhibit 1 photograph 27</p> <p>12 Exhibit 2 declaration 31</p> <p>13 Exhibit 3 grievance 34</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 EXAMINATION</p> <p>2 BY MR. STILLMAN</p> <p>3 Q. Okay. Mr. Williams, have you ever</p> <p>4 given a deposition before?</p> <p>5 A. No.</p> <p>6 Q. All right. So, before we start, can</p> <p>7 you please state your full name and spell it for</p> <p>8 the record?</p> <p>9 A. My name is Efferson Yarnell Williams.</p> <p>10 Q. And can you spell it for the record?</p> <p>11 A. You said --</p> <p>12 Q. Spell your name.</p> <p>13 A. -- spell it?</p> <p>14 Q. Yeah.</p> <p>15 A. I'm sorry. Efferson, E-f-f-e-r-s-o-n.</p> <p>16 Yarnell, Y-a-r-n-e-l-l. Williams,</p> <p>17 W-i-l-l-i-a-m-s.</p> <p>18 Q. So just to make things easier on the</p> <p>19 court reporter here, we're going to go over a</p> <p>20 couple rules.</p> <p>21 So just, first, let's try not to</p> <p>22 speak over one another. If one of us is speaking,</p> <p>23 we'll just wait until the other is done just so</p> <p>24 that nothing is overlapping in the transcript.</p> <p>25 Next, any answers to questions</p>

<p style="text-align: right;">Page 6</p> <p>1 should be verbal. And then if you can kind of try 2 to refrain from gesturing as much as you can 3 because that won't be clear in the record. 4 Third, if you don't understand any 5 of my questions, please absolutely let me know and 6 I can try to rephrase them so you do understand 7 it. If do you answer, I'm going to assume that 8 you understood the question. 9 A. Yes. 10 Q. And if there's anything you don't 11 recall, don't try to guess, just say that you 12 don't recall. 13 And like Pat said before, if you 14 need a break, just let me know. We can figure it 15 out. 16 A. Yeah. 17 Q. All right. So do you have any other 18 -- do you go by any other names? 19 A. No. 20 Q. Well, I mean, Efferson Williams is 21 your government name. Does anyone else call you 22 anything else behind bars? 23 A. No. You said like anywhere else, like 24 in the jail? 25 Q. Yeah. Like, in the jail they call you</p>	<p style="text-align: right;">Page 8</p> <p>1 A. Yes. I had -- I had -- I made sure 2 that I came when I came. I did -- when I talked 3 to my lawyer, we just went -- and we just -- 4 MR. MORRISSEY: Sorry, Mr. Williams, 5 you can say what you looked at but don't say what 6 we've spoken about. All right? So you can keep 7 going -- 8 THE WITNESS: I just looked at my 9 grievance. Yes. I looked at my grievance and 10 just went over my grievance. That's what I did. 11 BY MR. STILLMAN: 12 Q. Just -- and all you looked at was your 13 grievance? Anything else? 14 A. No. 15 Q. And was there only one grievance you 16 looked at? 17 A. No. I have -- I have multiple 18 grievances. 19 Q. Did you look at all of them in 20 preparation for this? 21 A. I suppose so. I think so. I suppose. 22 Q. And about when did that meeting with 23 your attorneys happen? 24 A. I don't know an exact date. To my 25 recall, it was probably like three to four days</p>
<p style="text-align: right;">Page 7</p> <p>1 anything else. 2 A. They just call me like A-1 or 3 something like that, or Alfie. Alfie, A-l-f-i-e. 4 Q. And what is your date of birth? 5 A. April 10, 1981. 6 Q. And are you married? 7 A. No. 8 MR. STILLMAN: And then off the record 9 for a minute. 10 (A discussion was held off 11 the record.) 12 MR. STILLMAN: All right. And back on 13 the record. 14 BY MR. STILLMAN: 15 Q. What did you do to prepare for your 16 deposition today? 17 A. What did I do to prepare for it? 18 Q. Yes. 19 A. And can you break down the word 20 "deposition" for me, please? 21 Q. So right now this is your depo -- This 22 is a deposition right now you're in where I'm 23 asking you questions. So what did you do today to 24 prepare? Did you look at anything? Did you talk 25 to anyone?</p>	<p style="text-align: right;">Page 9</p> <p>1 ago. 2 Q. Would you say it was longer or shorter 3 than half an hour? 4 A. Probably like -- probably like a half 5 an hour. 6 Q. And Pat here is your attorney. Is 7 that correct? 8 A. Yes. 9 Q. Have you ever personally reviewed any 10 ADA standards or Cook County jail policies and 11 procedures regarding inmate transport for the 12 jail? 13 A. You said have I ever proceeded any 14 other -- 15 Q. Sorry. Have you ever -- I'll re-ask 16 it. 17 Have you ever personally reviewed 18 anything, any kind of policies or procedures from 19 the jail that dictate movement of inmates? 20 A. Movement? So have I -- 21 Q. Yes. 22 A. -- ever -- did I dictate? Like, I'm 23 trying to figure out what does that mean. 24 Q. So you know when you're -- like 25 transportation of inmates, you know, when you're</p>

<p style="text-align: right;">Page 10</p> <p>1 being moved, say you have an appointment at Cermak</p> <p>2 and there's an officer with you and they're</p> <p>3 escorting you --</p> <p>4 A. Yes. Yes. An officer do escort me,</p> <p>5 yes.</p> <p>6 Q. Have you ever reviewed any of the</p> <p>7 actual written policies and procedures from the</p> <p>8 jail regarding, you know --</p> <p>9 A. Is it -- is it written anywhere?</p> <p>10 Q. There are written policies, yes.</p> <p>11 A. But it's not written where you can see</p> <p>12 them, though.</p> <p>13 Q. But so I'm asking you. Have you ever</p> <p>14 personally reviewed any?</p> <p>15 A. Have I ever seen any physically like</p> <p>16 on walls or anything? That's what you're asking?</p> <p>17 Q. I'm just asking if you've ever</p> <p>18 personally reviewed any of these -- any of these</p> <p>19 types of policies and procedures.</p> <p>20 A. No. Only -- only -- only when I put</p> <p>21 in the grievance, they --</p> <p>22 Q. Okay. And do you know Detainee</p> <p>23 Eugene Westmoreland?</p> <p>24 A. You said do I know who?</p> <p>25 Q. Eugene Westmoreland.</p>	<p style="text-align: right;">Page 12</p> <p>1 MR. MORRISSEY: And, Mr. Williams, I</p> <p>2 just want to remind you, things we've talked about</p> <p>3 are privileged. So just answer his questions</p> <p>4 without divulging any privileged communication you</p> <p>5 and I may have had. Okay?</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MR. STILLMAN:</p> <p>8 Q. And you're housed in the RTU.</p> <p>9 Correct?</p> <p>10 A. Yes.</p> <p>11 Q. And in the last ten years have you</p> <p>12 been convicted of any crimes?</p> <p>13 A. No.</p> <p>14 Q. When were you first processed at the</p> <p>15 Cook County jail right now under your current</p> <p>16 booking number?</p> <p>17 A. When I first processed?</p> <p>18 Q. Under this booking number, yes.</p> <p>19 A. Under this number? 2021. They say</p> <p>20 October, but it was September.</p> <p>21 Q. So you're -- you've been there about</p> <p>22 going on three years-ish, a little under three</p> <p>23 years now?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And you've been housed in the</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Do I know him?</p> <p>2 Q. Yeah. Are you familiar with him?</p> <p>3 A. No.</p> <p>4 Q. Have you heard of the name?</p> <p>5 A. I think I -- I don't know. I never</p> <p>6 heard the name.</p> <p>7 Q. Did you receive any documentation in</p> <p>8 relation to this deposition, like the subpoena</p> <p>9 that was, like, notice that you were going to be</p> <p>10 coming to this deposition today?</p> <p>11 A. My lawyer -- my lawyer told me that we</p> <p>12 was going to have court today.</p> <p>13 Q. And are you aware of any of the</p> <p>14 details of the case that you are being deposed in</p> <p>15 right now?</p> <p>16 A. As far as the ramp? Is that what</p> <p>17 you're saying?</p> <p>18 Q. It is about the ramp, yeah. Do you</p> <p>19 know any of the individual details of Mr. -- of</p> <p>20 the case or whose case this is or any of the</p> <p>21 allegations made?</p> <p>22 A. No. I don't know who -- who case this</p> <p>23 is. I just know that I had got not a subpoena for</p> <p>24 court but a letter explaining the situation of the</p> <p>25 ramp. But I never got a subpoena for court.</p>	<p style="text-align: right;">Page 13</p> <p>1 RTU your entire time there?</p> <p>2 A. Yes.</p> <p>3 Q. Have you gone to Cermak for any</p> <p>4 appointments or medical needs?</p> <p>5 A. Yes.</p> <p>6 Q. About how often would you say you've</p> <p>7 gone to Cermak?</p> <p>8 A. I went more than -- you said how</p> <p>9 often? Every time I have a -- say I have to go to</p> <p>10 a clinic appointment or either I got to go to ER.</p> <p>11 So it's like -- sometimes it be probably three</p> <p>12 times a month or twice a month.</p> <p>13 Q. When you -- when you've been taken to</p> <p>14 Cermak, how would they take you there?</p> <p>15 A. They have an officer who transport.</p> <p>16 Q. And they would transport you through</p> <p>17 the basement of the RTU. Right?</p> <p>18 A. They take me up the RTU ramp and down</p> <p>19 -- up the -- up the Cermak ramp and down the</p> <p>20 Cermak -- RTU ramp -- no. They take me up the RTU</p> <p>21 ramp first and down the Cermak ramp.</p> <p>22 Q. But to get to those ramps you would --</p> <p>23 you would be going through the tunnels and</p> <p>24 corridors in the basement of Division 8, the RTU.</p> <p>25 Correct?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. Yeah. I go to -- through the -- I 2 think it's not so much sort of a basement. I 3 think it's like the second floor or something. 4 But it led to the basement, I guess. I don't 5 know. 6 Q. And would you take the elevators 7 there? 8 A. To RTU? 9 Q. Down -- down into the tunnel area or 10 are you already -- 11 A. Yeah. To the tunnel, yes, I take it 12 'cuz I'm on the third floor, yes. 13 Q. And you are in a wheelchair. Correct? 14 A. Yes. 15 Q. What -- can you explain a little bit 16 about your medical history, how you -- how you're 17 in a wheelchair? 18 A. I'm in a wheelchair because I've got 19 -- I got shot. 20 Q. And when did you get shot? 21 A. 2017. 22 Q. And where -- where were you shot at? 23 What is the specific injury you have that -- 24 A. I got shot not directly into the 25 spine. It enlarged -- excuse me -- it enlarged</p>	<p style="text-align: right;">Page 16</p> <p>1 cuffed. Right? 2 Q. Yeah. When they get to push chairs, 3 they -- they tend to get the cuffs off. Right? 4 That's kind of my -- 5 A. Yes. 6 Q. -- understanding of that. 7 A. Yes. 8 Q. And the officers that have pushed you, 9 was that on your request? 10 A. No. It became from the ADA request, 11 not mine. 12 Q. What do you mean by it became an ADA 13 request? 14 A. They had got notified to make sure 15 that they -- by the ADA, what's her name, I forgot 16 what the name, but the title of the name. But, 17 yes, that's how. But prior to that they never 18 pushed me. 19 Q. And have you ever asked any officer to 20 push you and been denied? 21 A. Yes. 22 Q. And what would you do in an instance 23 where you were denied for officers that know you? 24 A. I wrote a grievance about it. 25 Q. You wrote -- sorry, what was that</p>
<p style="text-align: right;">Page 15</p> <p>1 to -- it enlarged to my spine which made me a T-5. 2 Q. And when you are moving around the 3 jail, how do you tend to propel your chair? 4 A. I push it myself. 5 Q. Do you always push it yourself? 6 A. Yes. 7 Q. Do you ever have anyone else assist 8 you pushing the chair? 9 A. Not -- not frequently. But minor 10 times like. Since I been here at Cook County, 11 probably like ten. 12 Q. And who would those -- who would the 13 other people assisting have been on those ten 14 times? 15 A. Sometimes an inmate and sometimes an 16 officer. 17 Q. Would you ask other inmates to push 18 your chair? 19 A. No. They offer. 20 Q. Why would they offer? 21 A. Just because I guess sometimes they'll 22 be wanting to get not put in handcuffs. 23 Q. And they're not cuffed when they -- 24 when they get to push usually. Isn't that right? 25 A. No -- yes, sir. You said they're not</p>	<p style="text-align: right;">Page 17</p> <p>1 about it? 2 A. I wrote a -- a grievance about it. 3 Q. Oh, okay. And would that -- would 4 that have been all you would have done or would 5 you have -- I mean, were you asking officers a lot 6 to -- for assistance while being transported? 7 A. They -- I mean, they -- with ADA, 8 what's her name, they supposed to assist me. So I 9 would -- I would felt that they would have known 10 to do it. Protocols, ADA protocols. 11 Q. Okay. And are you aware of any 12 policies, procedures, or rules at the jail that 13 dictate that someone else should be pushing you 14 when transporting from one location to another, 15 whether that's an inmate or an officer or any 16 other party pushing you? 17 A. No. 18 Q. Are you aware of any policies, 19 procedures, or rules at the jail that would 20 prevent another detainee from pushing you? 21 A. You're saying am I aware of that it 22 supposed to be only an inmate -- I mean, a 23 correctional officer to push me or inmate? Is 24 that -- 25 Q. Yeah. Let me reword it.</p>

5 (Pages 14 - 17)

<p style="text-align: right;">Page 18</p> <p>1 Are you aware of any policies, 2 procedures, or rules at the jail that say that an 3 inmate, another detainee, cannot push you? 4 A. No, I've never seen it. 5 Q. What about the same for an officer 6 cannot push you? 7 A. Once -- once I filed a grievance, I 8 was acknowledged. 9 Q. But are you aware of any policies that 10 would forbid an officer or mandate that an 11 officer, either/or? 12 A. No, there's not. There's not. Yes, 13 it's in the manual I think. It's in the CCDOC 14 manual. 15 Q. Which? Which CCDOC manual? 16 A. They have a booklet that they give 17 out. 18 Q. Yes. But are you saying there's a 19 policy or procedure that you know of in there? 20 A. I can't recall where it's at. 21 Actually, no, it's not even in there I think. 22 It's not even in there. I can't remember it 23 right. I can't vividly remember where it's at. 24 But I know I was told that I'm supposed to get 25 assistance going through the jail either going to</p>	<p style="text-align: right;">Page 20</p> <p>1 today that you were down there? 2 A. Just 2/22 -- I mean 4/22 and 4/23. 3 Q. And do you recall any ramps under the 4 RTU specifically that you have -- that you were 5 traversing? 6 A. You said do I recall any other ramps? 7 Q. Well, any specific ramps under the RTU 8 that you've had difficulties with? 9 A. There's only -- there's only two ramps 10 that I've noticed. But it's -- and that's going 11 from -- from RTU to Cermak and Cermak to West -- 12 -- oh, the ramps in the court -- going to the 13 court building. 14 Q. And so there's the court building -- 15 like you said, the court building ramp and the 16 Cermak ramp. Have you had trouble with both of 17 those? 18 A. Yes. 19 Q. Any other ramps that you can think of 20 that you've had difficulties with? 21 A. Going into -- it's a ramp going up and 22 down in Stroger's once we get down into -- 23 Q. Okay. So I'm just going to stop you 24 there. So we don't need to go into Stroger. 25 MR. MORRISSEY: Hold up. Hold up.</p>
<p style="text-align: right;">Page 19</p> <p>1 court, up a ramp, down a ramp, yeah. 2 Q. And who -- do you have any idea who 3 would have informed you of that? 4 A. Sabrina. 5 Q. So as we kind of discussed a little 6 bit here, you're familiar with the ramps, 7 corridors, and hallways in the RTU. Correct? 8 A. You're saying -- 9 Q. The area where you've -- where you've 10 been transported, you know, like to Cermak and 11 such from -- from the RTU, you're familiar with 12 that area of corridors, ramps, and hallways? 13 A. Am I familiar with the court orders? 14 Q. Are you familiar with the areas under 15 Division 8 that you've been transported through to 16 Cermak? 17 A. Yes. 18 Q. So you recognize the ramps, corridors, 19 and hallways that -- 20 A. Yes. 21 Q. -- would be down there more or less? 22 A. Yes. I been going through them for 23 almost three years. So now, yeah. But not at 24 first, though. 25 Q. And when was the last time just from</p>	<p style="text-align: right;">Page 21</p> <p>1 Mr. Stillman, you can't cut him off when he's 2 answering. So I think you should -- 3 MR. STILLMAN: Okay. 4 MR. MORRISSEY: Can you finish, 5 Mr. Williams? 6 THE WITNESS: Yes. Up and down 7 Stroger's ramp through the -- through the back. 8 It's a -- it's a ramp that's there, a steep ramp, 9 going and coming from Stroger's. 10 BY MR. STILLMAN: 11 Q. Okay. And do you recall there being 12 handrails on either of the -- well, let's focus on 13 the Cermak ramp, I guess. Do you recall there 14 being handrails on the Cermak ramp? 15 A. Yes. But not close enough for us to 16 use. 17 Q. And when you say "close enough for us 18 to use," how do you mean? 19 A. Not at arm reach, and both arm reach. 20 So it's probably one you can use on one hand and 21 the other one is not in arm reach to use. So if 22 I'm using my right hand, my left hand can't touch 23 the other arm rail -- the handrail. 24 Q. Okay. And have you ever -- have you 25 ever complained to anyone about that issue, about</p>

<p style="text-align: right;">Page 22</p> <p>1 the handrail issue?</p> <p>2 A. Yes.</p> <p>3 Q. And that would have been in your</p> <p>4 grievance?</p> <p>5 A. Yes.</p> <p>6 Q. Have you ever made any other complaints</p> <p>7 about that?</p> <p>8 A. Verbally.</p> <p>9 Q. And when would the result of a verbal</p> <p>10 complaint on the spot have been?</p> <p>11 A. What can they do about it?</p> <p>12 Q. And would that verbal complaint have</p> <p>13 been about the handrail specifically?</p> <p>14 A. Yes.</p> <p>15 Q. Or would that -- or would it have been</p> <p>16 about having difficulties getting up or down the</p> <p>17 ramp?</p> <p>18 A. Both.</p> <p>19 Q. And when you communicated that you</p> <p>20 were having explicit difficulties, you know,</p> <p>21 making it the full way across the ramp, have they</p> <p>22 -- has any officer ever assisted?</p> <p>23 A. They just started. I been going up</p> <p>24 and down the ramps prior to this for two -- like</p> <p>25 two, two years and like a couple months by myself</p>	<p style="text-align: right;">Page 24</p> <p>1 Mr. Williams. You can respond.</p> <p>2 THE WITNESS: I don't have to respond</p> <p>3 you said?</p> <p>4 BY MR. STILLMAN:</p> <p>5 Q. No. Do you want me to -- I'm going to</p> <p>6 reword the question anyways. It was kind of</p> <p>7 confusing. But you do have to respond.</p> <p>8 So when you -- have you ever not</p> <p>9 made it across the ramp, the Cermak ramp?</p> <p>10 A. Have I ever not made it?</p> <p>11 Q. I mean, have you ever, you know, found</p> <p>12 yourself struggling partway and --</p> <p>13 A. Always.</p> <p>14 Q. -- and just not ultimately made the</p> <p>15 rest of the journey?</p> <p>16 A. I always struggle. But they -- they</p> <p>17 just like some refuse to help 'til I say, "Can you</p> <p>18 push me?"</p> <p>19 Q. But you've never -- you've never</p> <p>20 struggled and then ultimately turned around and</p> <p>21 been returned to your cell as opposed to getting</p> <p>22 help. Right?</p> <p>23 A. No. 'Cuz they eventually will push me</p> <p>24 out there if they see I'm struggling.</p> <p>25 Q. So you've never, I mean, gotten --</p>
<p style="text-align: right;">Page 23</p> <p>1 without any -- any assistance.</p> <p>2 Q. And you said they just started. So</p> <p>3 when would they have just started doing that?</p> <p>4 A. When I put in the grievance, which</p> <p>5 would be -- they started like late, late -- late</p> <p>6 December, late December or the beginning -- yeah,</p> <p>7 like late December of '23.</p> <p>8 Q. Okay. And have you -- do you recall</p> <p>9 any other issues with that ramp other than, you</p> <p>10 know, the steepness or the handrails?</p> <p>11 A. Yeah. How the door is. The -- even</p> <p>12 if I go down the ramp and I just so happen to go</p> <p>13 down the ramp, the door is right there where I can</p> <p>14 hit it.</p> <p>15 Q. And any other issues you know of?</p> <p>16 A. No, not so much.</p> <p>17 Q. And so when you've used those -- when</p> <p>18 you have used -- strike that.</p> <p>19 When you have traversed the Cermak</p> <p>20 ramp, have you had any difficulties any time?</p> <p>21 Have you not made it all the way if you've had</p> <p>22 troubles or have you ultimately gotten assistance</p> <p>23 at any of these times that you truly struggled?</p> <p>24 MR. MORRISSEY: Objection to form.</p> <p>25 I just made an objection,</p>	<p style="text-align: right;">Page 25</p> <p>1 you've never been kept from getting to where you</p> <p>2 need to go or going to your appointments as a</p> <p>3 result of this ramp?</p> <p>4 A. I never detoured, if what you're</p> <p>5 saying. Is that what you're saying, like I never</p> <p>6 detoured -- had to go back to my cell?</p> <p>7 Q. I mean, yeah, they never -- they never</p> <p>8 just called off any effort to get you somewhere</p> <p>9 because you were struggling with the ramp? It</p> <p>10 wasn't like you canceled your medical appointment</p> <p>11 because you had issues or something?</p> <p>12 A. Yes, I've canceled medical appoint-</p> <p>13 ments before.</p> <p>14 Q. Well, have you -- have you ever been</p> <p>15 mid-transport to a medical appointment, had</p> <p>16 difficulties, and had a transfer -- or had the</p> <p>17 appointment canceled as opposed to receiving</p> <p>18 assistance --</p> <p>19 A. No.</p> <p>20 Q. -- on the ramp? No?</p> <p>21 A. Not to my recall, no.</p> <p>22 Q. So you -- as far as you can remember,</p> <p>23 you've never been kept back from receiving any</p> <p>24 services or going anywhere or getting the same</p> <p>25 kind of treatment as another detainee because of</p>

7 (Pages 22 - 25)

<p style="text-align: right;">Page 26</p> <p>1 this ramp. Right?</p> <p>2 A. No. What? Because we take -- okay.</p> <p>3 When we going to transportation, we take a</p> <p>4 different -- we take -- we don't take the Cermak</p> <p>5 and the RTU ramp.</p> <p>6 Q. So, I mean, if they've taken you</p> <p>7 another way, you've still made it to your</p> <p>8 destination. Right?</p> <p>9 A. Yes.</p> <p>10 Q. So just yes-or-no question, can you</p> <p>11 say that you recall ever being treated in a way</p> <p>12 that you had less access to any of these treat-</p> <p>13 ments or appointments because of this ramp?</p> <p>14 A. What ramp? The RTU or the Cermak?</p> <p>15 Q. The Cermak ramp that we have been</p> <p>16 talking about.</p> <p>17 A. But there's two ramps. There's a</p> <p>18 Cermak ramp and a RTU ramp.</p> <p>19 Q. So you're --</p> <p>20 A. They're not the same. There's two</p> <p>21 different ramps.</p> <p>22 Q. We're going to -- I'm going to put up</p> <p>23 a photo that we're going to call -- actually, one</p> <p>24 second here. Let's clear this up a little bit.</p> <p>25 I'm going to bring up a photo that we're going to</p>	<p style="text-align: right;">Page 28</p> <p>1 the 23rd.</p> <p>2 Q. And on that occasion did you have</p> <p>3 difficulties?</p> <p>4 A. Yes. I had to have someone -- after I</p> <p>5 got up so much, like in the middle part of the</p> <p>6 ramp, the steepness of the ramp, so I think they</p> <p>7 had to, like, so much -- he seen me started</p> <p>8 struggling, so he got behind me and pushed me.</p> <p>9 Q. Have you ever been injured in any</p> <p>10 capacity while going --</p> <p>11 A. Yes.</p> <p>12 Q. -- up or down the ramp?</p> <p>13 MR. MORRISSEY: Objection.</p> <p>14 THE WITNESS: Yes.</p> <p>15 MR. MORRISSEY: Objection.</p> <p>16 You can respond.</p> <p>17 MR. STILLMAN: Sorry, Pat, what was --</p> <p>18 what was your objection?</p> <p>19 MR. MORRISSEY: Object to the form of</p> <p>20 the question.</p> <p>21 MR. STILLMAN: Okay.</p> <p>22 MR. MORRISSEY: You can respond.</p> <p>23 THE WITNESS: Yes.</p> <p>24 BY MR. STILLMAN:</p> <p>25 Q. And what kind of injuries have you</p>
<p style="text-align: right;">Page 27</p> <p>1 call Exhibit 1.</p> <p>2 (Williams Deposition</p> <p>3 Exhibit 1 was marked.)</p> <p>4 BY MR. STILLMAN:</p> <p>5 Q. And do you recognize this ramp, this</p> <p>6 area?</p> <p>7 A. Yes. That's the -- I think this the</p> <p>8 RTU ramp.</p> <p>9 Q. And are these handrails the ones that</p> <p>10 you have been saying are not within arm's reach?</p> <p>11 A. Yes.</p> <p>12 Q. And this is a different ramp from the</p> <p>13 RTU -- from the Cermak ramp you're saying?</p> <p>14 A. Yes. That's -- that's just the one</p> <p>15 ramp. That's just the one that you go up to go</p> <p>16 to --</p> <p>17 Q. This is -- sorry. Go ahead.</p> <p>18 A. This is the one you go up to go to</p> <p>19 Cermak.</p> <p>20 Q. And you've traversed this ramp before</p> <p>21 in your chair?</p> <p>22 A. Traversed? What -- what you mean --</p> <p>23 Q. You've gone -- you've gone down this</p> <p>24 ramp or up this ramp in your wheelchair before?</p> <p>25 A. Yes. I just did it on the 22nd and</p>	<p style="text-align: right;">Page 29</p> <p>1 experienced?</p> <p>2 A. I had burns on my -- on both of my</p> <p>3 hands, the arms.</p> <p>4 Q. How would -- how would those injuries</p> <p>5 have occurred?</p> <p>6 A. From trying to stop -- stop my chair</p> <p>7 with my hands, no gloves.</p> <p>8 Q. And what part of the chair would you</p> <p>9 have put your hands on to stop it?</p> <p>10 A. The wheel.</p> <p>11 Q. So the burn -- the burns would have</p> <p>12 been from rubbing against the wheels?</p> <p>13 A. Yes.</p> <p>14 Q. Have you ever sought any kind of</p> <p>15 medical treatment for any kind of injury like</p> <p>16 that?</p> <p>17 A. I explained to them. They didn't --</p> <p>18 they did nothing. So no.</p> <p>19 Q. No, you haven't gotten treated?</p> <p>20 A. I went there. But they didn't report</p> <p>21 it. Like, they didn't -- they looked at my hands,</p> <p>22 but they didn't report it or document it.</p> <p>23 Q. And when would that have been?</p> <p>24 A. That was -- it's been a lot of times.</p> <p>25 I can't just say directly dates. But one of the</p>

<p style="text-align: right;">Page 30</p> <p>1 dates was December 7, 6 or 7.</p> <p>2 Q. So there have been a lot of times that</p> <p>3 they have -- they have looked at you and not found</p> <p>4 anything wrong you're saying?</p> <p>5 A. Yes. And they not have documented it.</p> <p>6 It's not been documented by my hands -- about my</p> <p>7 hands.</p> <p>8 Q. But they have looked at them and --</p> <p>9 A. Yes. Even the ADA coordinator looked</p> <p>10 at it.</p> <p>11 Q. Have any jail staff ever told you that</p> <p>12 another inmate could not push your chair?</p> <p>13 A. No.</p> <p>14 They saying this about to restart.</p> <p>15 Q. Pardon?</p> <p>16 A. On this computer, they saying it's</p> <p>17 about to be restarted. The software sent it to</p> <p>18 me.</p> <p>19 MR. STILLMAN: Oh, here, let's go off</p> <p>20 the record for a second.</p> <p>21 (A discussion was held off</p> <p>22 the record.)</p> <p>23 BY MR. STILLMAN:</p> <p>24 Q. All right. So you -- do you remember</p> <p>25 signing a declaration about the ramp in this case?</p>	<p style="text-align: right;">Page 32</p> <p>1 Cermak. Is that right?</p> <p>2 A. Yes.</p> <p>3 Q. And that you experience hardship</p> <p>4 moving up and down that ramp. And on one occasion</p> <p>5 you recall almost falling out of your wheelchair</p> <p>6 while navigating that ramp. Is that right?</p> <p>7 A. Yes.</p> <p>8 Q. And you also experienced burning hands</p> <p>9 on your -- burning on your hands when traversing</p> <p>10 the ramp. Correct?</p> <p>11 A. Yes.</p> <p>12 Q. And then you say it's very rare for</p> <p>13 staff to assist you in traversing the ramp?</p> <p>14 A. Yes.</p> <p>15 Q. And then you signed that on</p> <p>16 November 28, right --</p> <p>17 A. Yes.</p> <p>18 Q. -- 2023?</p> <p>19 And you said -- didn't you say</p> <p>20 that shortly after that was when they started</p> <p>21 assisting, in late December? Right?</p> <p>22 A. December -- after -- I mean, it was</p> <p>23 after did I put my grievance in. If I wouldn't</p> <p>24 have never grieved it, they would have never</p> <p>25 assisted.</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Can you explain to me like declara-</p> <p>2 tion?</p> <p>3 Q. Do you remember -- do you remember</p> <p>4 signing any kind of document with statements from</p> <p>5 you about the RTU/Cermak ramps?</p> <p>6 A. Yes.</p> <p>7 Q. And that would be -- I'm just calling</p> <p>8 this Exhibit 2.</p> <p>9 (Williams Deposition</p> <p>10 Exhibit 2 was marked.)</p> <p>11 BY MR. STILLMAN:</p> <p>12 Q. That would be this document. Correct?</p> <p>13 A. Yes.</p> <p>14 Q. And that is your signature?</p> <p>15 A. Yes.</p> <p>16 Q. And just to kind of summarize this</p> <p>17 declaration here essentially, just tell me if I am</p> <p>18 mis-testifying, your name is Efferson Williams.</p> <p>19 Incarcerated in Division 8, Tier 3H. 42 years old</p> <p>20 and use a wheelchair and you have a T-5 spinal</p> <p>21 cord injury. Is this all correct so far?</p> <p>22 A. Yes.</p> <p>23 Q. You say there's a steep and long ramp</p> <p>24 in the basement of the RTU that is used for you to</p> <p>25 travel to various places at the jail, including</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Okay. And just shortly after that,</p> <p>2 like late November '23, that would have been</p> <p>3 December 2023 when they -- around when they might</p> <p>4 have started helping. Right?</p> <p>5 A. Yeah. Probably like a month or so</p> <p>6 later or something like that.</p> <p>7 I mean, just -- just, what's today,</p> <p>8 the 23rd?</p> <p>9 Q. The 25th.</p> <p>10 A. The 25th. Just on the 23rd I had to</p> <p>11 write another grievance because they not doing --</p> <p>12 ADA, what's her name, about me being -- getting</p> <p>13 assistance up and down the ramp, which is</p> <p>14 documented I wait for the response to what's her</p> <p>15 name.</p> <p>16 It's about to shut down. It's</p> <p>17 about to shut off. It's saying that.</p> <p>18 Q. Okay.</p> <p>19 A. It's saying -- it just showed up on</p> <p>20 the computer saying that --</p> <p>21 MR. MORRISSEY: Why don't you get the</p> <p>22 -- why don't you get the officer, Mr. Williams.</p> <p>23 MR. STILLMAN: Yeah. Get the officer</p> <p>24 back in there.</p> <p>25 Let's go off the record again.</p>

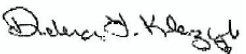
<p style="text-align: right;">Page 34</p> <p>1 (A break was taken from 2 11:55 a.m. until 3 12:06 p.m.) 4 BY MR. STILLMAN: 5 Q. All right. So we'll call this next 6 exhibit Exhibit 3. 7 (Williams Deposition 8 Exhibit 3 was marked.) 9 BY MR. STILLMAN: 10 Q. And do you recognize this grievance? 11 A. Yes. 12 Q. Is this your handwriting on it? 13 A. Yes. 14 Q. Would this have been -- do you 15 recognize this to have been one of your grievances 16 about the ramps? 17 A. Yes. 18 Q. And in this grievance you're filing it 19 against Correctional Officers Cato and Remszik. 20 A. Remszik, yes. It's Remszik. 21 Q. Okay. And just essentially you're 22 complaining here that the upward and downward 23 ramps require a guard's assistance and you 24 received help going up -- or, yes, received help 25 going up the ramp but on descending you did not.</p>	<p style="text-align: right;">Page 36</p> <p>1 were just talking about before? Or you said you 2 had another one you filed in April? 3 A. Yeah. I have the one that I just did 4 on the -- 4/22. 5 Q. Okay. 6 A. 4/22/24. 7 Q. That was -- the subject of that was 8 more or less the same of the same ramp, the same 9 types of issues? 10 A. I'm sorry, one was 4/22/23 which is 11 the court building situation. But this one 4/22 12 -- 4/23/24 was when I just up the ramp and Officer 13 Thompson refused to help. He didn't want to help 14 me. 15 Q. So you asked that day officers for 16 assistance, though? 17 A. Yes. 18 Q. And you did get assistance going up? 19 A. At midway. At midway up the ramp. 20 Q. But then going down you didn't and 21 then you lost control? 22 A. Oh, I'm sorry. I'm sorry. I thought 23 you was talking about the 4/23 -- 24 Q. Oh, no, no, no, no. We're back to -- 25 we're back to this current one on screen. Sorry</p>
<p style="text-align: right;">Page 35</p> <p>1 Correct? 2 A. I'm saying down, downward, no. 3 Q. And then you say that you lost control 4 of your chair during the downward journey. 5 Correct? 6 A. Yes. 7 Q. And you -- the chair picked up speed, 8 and to avoid great injury from slamming into a 9 wall, door, or another person you were forced to 10 use your hands on the bare tires to stop your 11 chair. Correct? 12 A. Yes. 13 Q. And then you say you still have the 14 burn marks on the palms of your hands, which are 15 painful. Correct? 16 A. Yes. Which is shown, the burns. You 17 can see it. 18 Q. I got you. 19 And do you remember this specific 20 incidence? 21 A. Yes. 22 Q. And this was 12/6/23, so this was 23 pretty recent. Right? 24 A. Yes. 25 Q. And was this the later grievance you</p>	<p style="text-align: right;">Page 37</p> <p>1 about that. 2 A. Yes. 3 Q. So, yeah, you -- so you lost control 4 there, though, after receiving help going up, on 5 the -- 6 A. Yes. 7 Q. -- way down? 8 A. Yes. 9 Q. And did you ever get any medical 10 attention for the -- 11 A. They -- 12 Q. -- burn? 13 A. They looked -- they looked at it but 14 didn't document it. They just looked at it. 15 Q. Didn't document it? 16 A. Yes. 17 Q. And they received this from you on 18 12/8 it says right here? 19 A. Yes. Yes. That's what they gave me. 20 Q. Do you remember receiving -- receiving 21 the response to this from the jail? 22 A. They -- they gave me a response which 23 was saying after reviewing and speaking to the 24 staff members and the Detainee Williams it appears 25 that two of the officers misunderstood CCOS [sic]</p>

<p style="text-align: right;">Page 38</p> <p>1 policy. Detainee was pushed up the ramp but not 2 down the ramp. However, at the [sic] time he does 3 lose control of the wheelchair or nearly ran 4 into -- yes. [As read.] 5 Q. So you remember receiving this 6 response -- 7 A. Yes. 8 Q. -- correct? 9 A. Yes. 10 Q. And right here, just tell me if I'm 11 reading this correctly: However, at no time does 12 he lose control of the wheelchair or nearly run 13 into the wall. 14 Is that right? 15 A. They said at no time? 16 Q. It says: However, at no time does he 17 lose control of the wheelchair. 18 Is that -- is that right? 19 A. Yes, it says that. 20 Q. And it says: Available video shows 21 Detainee Williams gliding with ease through the 22 tunnels to and from Cermak. At no time did 23 Detainee Williams tell the officer that he was 24 having difficulty wheeling himself. 25 Is that what it says?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. You -- okay. So why do you think they 2 might have put in the response that after 3 reviewing the evidence and speaking with people 4 involved that you didn't -- you didn't say 5 anything? 6 MR. MORRISSEY: Objection. 7 Foundation. 8 You can respond. 9 THE WITNESS: I have no idea why they 10 said that. But I guess it was probably to cover 11 up. 12 BY MR. STILLMAN: 13 Q. To cover up? 14 A. The situation of me showing them that 15 I do have burns on my hands and -- 16 Q. Okay. 17 A. Yes. 18 Q. And you then -- so they got -- they 19 got your -- that response to you on 12/22/23 -- 20 A. Yes. 21 Q. -- which you then received on 22 January 5, 2024. Correct? 23 A. Yes. 24 Q. And can you read your appeal for me? 25 A. I did -- I did -- I did -- I did do --</p>
<p style="text-align: right;">Page 39</p> <p>1 A. Yes. 2 Q. And it says: Detainee Williams did 3 not report any burns to his hands from the 4 wheelchair, nor were there any wounds or healed 5 wounds to his hands during my discussion with him 6 on 12/21/23. 7 Is that right? 8 A. Yes. 9 Q. And then it also finally says that you 10 did not request medical attention for any alleged 11 wounds verbally or via written health service 12 request. Yeah? 13 A. Yes. On 12/23, yes, it says that. 14 Q. And, finally, it says staff will be 15 reminded to push wheelchairs up and down ramps to 16 document -- and to document any refusals of 17 assistance. Is that correct? 18 A. It's saying refusals? Yes. Yes. 19 Q. Yes. 20 A. Yes, it does say that. 21 Q. And is that -- and you say it's not 22 the case that you didn't -- that you did not tell 23 the officer that you were having difficulties. 24 Correct? 25 A. I always tell them that.</p>	<p style="text-align: right;">Page 41</p> <p>1 I do have burns on my hands. [As read.] 2 I was just letting them know that I 3 did do a lot of stuff on the video and that I let 4 the staff know that I had burns on my hands. 5 Q. So that's just you insisting that you 6 were telling the truth, that you did complain to 7 the staff and you did have difficulties. Correct? 8 A. Yes. 9 Q. Okay. And they ultimately said the 10 original response was to stand. Right? 11 A. Yes. 12 Q. And did you receive that on January 16, 13 2024? 14 A. Yes. 15 Q. All right. And do you remember if on 16 this occasion you had actually been -- I know she 17 said -- you know, this is from -- do you know who 18 that -- who that response was drafted by? I'll 19 show you. 20 A. You said do I know who the response 21 was from? 22 Q. Yeah. 23 A. I think it's -- I think it was -- 24 Q. It shows here. 25 A. Sabrina.</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. Do you have any -- you know who the 2 ADA compliance officer is. Correct?</p> <p>3 A. Yes. Sabrina.</p> <p>4 Q. And would you be surprised to hear 5 that she was the one who drafted the response to 6 that grievance?</p> <p>7 A. You said would I be what? I'm sorry.</p> <p>8 Q. Would you -- scratch that actually. 9 Forget it.</p> <p>10 Do you -- did she ever look at your 11 hands on this occasion?</p> <p>12 A. Not -- not right -- not exactly right 13 after the -- what's her name? Not exactly right 14 after the -- I had -- I had burns on my hand. She 15 probably came like two weeks later or something.</p> <p>16 Q. So you never had any actual attention 17 to your hands or alleged injuries by Cermak or any 18 actual medical doctors, though?</p> <p>19 A. No. They -- because, like I said, 20 they -- they didn't document it. They looked at 21 them. They gave me --</p> <p>22 Q. Okay.</p> <p>23 A. -- some ointment. But they didn't 24 document.</p> <p>25 I got to use the washroom.</p>	<p style="text-align: right;">Page 44</p> <p>1 EXAMINATION</p> <p>2 BY MR. MORRISSEY</p> <p>3 Q. Mr. Williams, you mentioned you have a 4 grievance that you just filed about going up or 5 down a ramp?</p> <p>6 A. Yes.</p> <p>7 Q. Can you -- I don't have that. Can you 8 show it on the screen? I'll see if I can -- it's 9 kind of hard to see. Can you perhaps read it for 10 us, Mr. Williams?</p> <p>11 A. Yes.</p> <p>12 While being -- while being escorted 13 to Cermak, I received assistance up the ramp but 14 not down the ramp. And after -- after my 15 appointment. While being escorted back to RTU, 16 Officer -- Officer Thompson provided minor 17 assistance going up the ramp but not down -- but 18 not assisting down the ramp. Per ADA person 19 Sabrina, I should be receiving help assisting 20 and listing [sic] these ramps each time -- 21 assisting the ramps each time. [As read.]</p> <p>22 Q. And what date does your grievance say 23 this happened, Mr. Williams?</p> <p>24 A. It happened on 4/23/24 approximately 25 like 1:00 p.m. to like 2:10.</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. And then just -- so they -- sorry. 2 Finished?</p> <p>3 A. Yes.</p> <p>4 I have to use the washroom real 5 fast.</p> <p>6 Q. Right now you do?</p> <p>7 A. Yeah. I got to go to the washroom.</p> <p>8 MR. STILLMAN: Actually, I'm done. 9 Pat, do you have anything?</p> <p>10 MR. MORRISSEY: I'm going to have 11 questions, though, so.</p> <p>12 MR. STILLMAN: Okay. So then we'll 13 let him go to the bathroom.</p> <p>14 THE WITNESS: Okay. I'm sorry, say it 15 again, sir.</p> <p>16 MR. MORRISSEY: We'll be here. We'll 17 be here, Mr. Williams.</p> <p>18 THE WITNESS: Okay.</p> <p>19 (A break was taken from 20 12:17 p.m. until 21 12:20 p.m.)</p> <p>22 MR. MORRISSEY: Are you done?</p> <p>23 MR. STILLMAN: Yeah, I'm good. I'm 24 done for now.</p> <p>25 ///</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. And does your grievance mention going 2 to Cermak or your trip from Cermak back to the 3 RTU?</p> <p>4 A. It's on my way to Cermak and back from 5 Cermak.</p> <p>6 Q. So what is -- does your grievance 7 mention that they didn't help you when you were 8 going to Cermak?</p> <p>9 A. Yes. It says I have -- I have not 10 received -- I have -- I have received assistance 11 to up the ramp but -- but not down the ramp. And 12 that's -- that's while being escorted to Cermak.</p> <p>13 Q. And then the same -- does your 14 grievance say the similar thing happened when the 15 officer escorted you from Cermak back to RTU, you 16 were --</p> <p>17 A. He gave me minor assistance going up 18 the Cermak ramp but not -- but not down the 19 Cermak. And that's going back to RTU.</p> <p>20 Q. Oh, so when you were going down you 21 were going down the RTU ramp, right, on your way 22 back?</p> <p>23 A. Yes. By myself.</p> <p>24 Q. And how long approximately were you at 25 Cermak that day? Was it just about an hour or</p>

<p style="text-align: right;">Page 46</p> <p>1 two?</p> <p>2 A. Yeah, approximately like an hour.</p> <p>3 Q. And do you know why you went to Cermak</p> <p>4 that day?</p> <p>5 A. Yes. To see a podometry [sic], some-</p> <p>6 thing like for my feet.</p> <p>7 Q. Oh, podiatrist?</p> <p>8 A. Podiatrist, yes. Podiatrist.</p> <p>9 Q. And was that the only reason why you</p> <p>10 were at Cermak, just to see the podiatrist and go</p> <p>11 back to your housing unit?</p> <p>12 A. Yes.</p> <p>13 Q. And when was that grievance collected?</p> <p>14 Does it say when the social worker signed for it?</p> <p>15 A. On the 24th.</p> <p>16 Q. So you were complaining about some-</p> <p>17 thing that happened on the 23rd of April, and then</p> <p>18 the following day it was collected by a social</p> <p>19 worker?</p> <p>20 A. Yes. It was the same one who was --</p> <p>21 me being -- going to the courtroom doors and my</p> <p>22 chair got stuck and almost got broken. I couldn't</p> <p>23 get -- I couldn't get through because the doors --</p> <p>24 the gates of going to the courtroom is narrow.</p> <p>25 Q. Okay. What court -- when were you</p>	<p style="text-align: right;">Page 48</p> <p>1 was escorting you?</p> <p>2 A. No. It just say the bailiff. I put</p> <p>3 the bailiff because I have -- I don't know -- I</p> <p>4 didn't know the officer's name probably.</p> <p>5 Q. Has anybody from the Sheriff's Office</p> <p>6 come to speak with you regarding your allegations</p> <p>7 in either of these two grievances you filed a</p> <p>8 couple days ago?</p> <p>9 A. No, sir.</p> <p>10 Q. I have nothing further. I appreciate</p> <p>11 your time, Mr. Williams.</p> <p>12 RE-EXAMINATION</p> <p>13 BY MR. STILLMAN</p> <p>14 Q. Okay. I got a -- I got a couple more.</p> <p>15 Mr. Williams, your -- do you</p> <p>16 remember how long it took on other occasions for</p> <p>17 them to respond to your grievances?</p> <p>18 A. One of them -- one of them took</p> <p>19 probably like a week. I think one of them</p> <p>20 probably took like a week or four to five days or</p> <p>21 something to reply. And I think that was the one</p> <p>22 that -- that was the one -- the one that replied</p> <p>23 took that long was because the coordinator had</p> <p>24 came to me with the quoted grievance in her hand</p> <p>25 and she wanted to ask me did I show -- is this the</p>
<p style="text-align: right;">Page 47</p> <p>1 going to court?</p> <p>2 A. I went to court 4 -- 4/22/24.</p> <p>3 Q. And what courtroom were you</p> <p>4 complaining about?</p> <p>5 A. Courtroom -- court -- the courtroom</p> <p>6 500.</p> <p>7 Q. Does your grievance say what -- what</p> <p>8 does your grievance say? Can you just read it to</p> <p>9 us?</p> <p>10 A. Yes.</p> <p>11 While being escorted to the</p> <p>12 courtroom -- to court, my wheelchair got stuck in</p> <p>13 the doorway of the bullpen for approximately ten</p> <p>14 minutes. During the proceedings, my chair was</p> <p>15 almost broken and the wheel were bent barely --</p> <p>16 barely scratched due -- due to being forced</p> <p>17 through the doorway. And exiting, returning from</p> <p>18 court the same -- the same assistant -- I mean,</p> <p>19 the same happened for me, my chair being forced</p> <p>20 through the doorway. [As read.]</p> <p>21 Q. Does the grievance say what time this</p> <p>22 occurred approximately?</p> <p>23 A. Yes. Approximately from 12:00,</p> <p>24 12 o'clock to 1:30.</p> <p>25 Q. Does your grievance say what officer</p>	<p style="text-align: right;">Page 49</p> <p>1 grievance that I wrote.</p> <p>2 Q. Okay. And would it sound right to you</p> <p>3 if I told you that grievance we were just looking</p> <p>4 at about the ramp at Cermak, that they received it</p> <p>5 from you on 12/8 and then got a response to you by</p> <p>6 12/22?</p> <p>7 A. Yes. That was the one --</p> <p>8 Q. And --</p> <p>9 A. I think that was the one I was waiting</p> <p>10 for 'cuz it was the one -- I think -- if I'm not</p> <p>11 mistaken, it was the one that she came to show me</p> <p>12 herself about the grievance and telling me she's</p> <p>13 going to respond. And the respond was -- the</p> <p>14 respond was --</p> <p>15 Q. So, you know, it's okay if you don't</p> <p>16 -- you don't have to go and to look at the</p> <p>17 response or not. It's just about if that sounds</p> <p>18 right about the time it took.</p> <p>19 A. Yeah. It took a little -- like, it</p> <p>20 took a minute, I know that for a fact, because I</p> <p>21 was -- I was asking why haven't it came.</p> <p>22 Q. So, Mr. Williams, we don't need the</p> <p>23 commentary. Just let's get this -- we don't have</p> <p>24 to get this -- too much more into anything. Let's</p> <p>25 kind of finish it up fast. Just a couple</p>

<p style="text-align: right;">Page 50</p> <p>1 questions.</p> <p>2 Just it would make sense then they</p> <p>3 have not -- to you that they haven't responded to</p> <p>4 your grievance yet that was collected yesterday by</p> <p>5 them. Right?</p> <p>6 A. No, they have not.</p> <p>7 Q. But it would make sense to you that</p> <p>8 that would seem normal and reasonable they have</p> <p>9 not yet responded to it in one day. Correct?</p> <p>10 A. Yes. That's -- that's -- they don't</p> <p>11 respond, they always be like somewhat prompt, not</p> <p>12 just right away. They don't respond just right</p> <p>13 away.</p> <p>14 Q. Okay.</p> <p>15 A. They usually go --</p> <p>16 Q. And that -- that first grievance that</p> <p>17 you were -- or the first new grievance that you</p> <p>18 were just talking with Pat about, the one about</p> <p>19 that the date of conduct was 4/23 approximately</p> <p>20 1:00 p.m. or 2:10 p.m., the ramp and your</p> <p>21 podiatrist appointment --</p> <p>22 A. Yes.</p> <p>23 Q. Do you recall ever requesting any</p> <p>24 assistance from officers there or was that another</p> <p>25 case where you had difficulties but refused to</p>	<p style="text-align: right;">Page 52</p> <p>1 A. Yes.</p> <p>2 Q. And no -- you have not -- you have not</p> <p>3 received a response from that grievance yet nor</p> <p>4 have you appealed it or anything. Right?</p> <p>5 A. No, I have not -- I have no response</p> <p>6 or have not a chance to read it -- appeal it.</p> <p>7 Q. All right. I have no further</p> <p>8 questions.</p> <p>9 RE-EXAMINATION</p> <p>10 BY MR. MORRISSEY</p> <p>11 Q. For the matter that you experienced a</p> <p>12 few days ago, I believe you mentioned it was on</p> <p>13 4/23 when you went to Cermak to the podiatrist</p> <p>14 appointment. Did you tell any medical -- did your</p> <p>15 hands hurt that day from braking?</p> <p>16 A. No. They didn't -- no, I didn't. I</p> <p>17 asked them to get me no medical assistance. No,</p> <p>18 I didn't.</p> <p>19 Q. All right. Can you -- when you get a</p> <p>20 chance, Mr. Williams, can you send me a copy of</p> <p>21 that grievance?</p> <p>22 A. These? Do you want the original copy?</p> <p>23 Q. Whatever you have.</p> <p>24 A. Okay. I will send -- I will send both</p> <p>25 of the original copies to you, sir.</p>
<p style="text-align: right;">Page 51</p> <p>1 ask?</p> <p>2 A. No. I -- okay. So by then I'm</p> <p>3 thinking by the ADA led to all the CCDOC staff</p> <p>4 that they knew, so I asked him did he -- I'm like,</p> <p>5 "You got to push me." He said -- he said nothing</p> <p>6 'til he seen me struggling at midway. Then he</p> <p>7 started pushing me.</p> <p>8 Q. And so, again there, you -- you made</p> <p>9 it to your podiatrist appointment and you made it</p> <p>10 back to your tier after. Correct?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And you were not kept from your</p> <p>13 podiatrist appointment in any way, your podiatry</p> <p>14 appointment in any way, by any --</p> <p>15 A. No, sir.</p> <p>16 Q. -- barrier the ramp may have posed?</p> <p>17 A. No, sir.</p> <p>18 Q. And you did ultimately receive</p> <p>19 assistance from an officer one of the ways when</p> <p>20 you were struggling. Correct?</p> <p>21 A. You said did I have the ultimate</p> <p>22 assistance?</p> <p>23 Q. You did -- you did receive assistance</p> <p>24 from an officer after you were partway up.</p> <p>25 Correct?</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. All right. Appreciate it.</p> <p>2 Any questions, Zach, or are we</p> <p>3 done?</p> <p>4 MR. STILLMAN: I think we're done.</p> <p>5 Hold on. All right. No, I think we're done.</p> <p>6 We're good. Yep.</p> <p>7 MR. MORRISSEY: All right. We'll</p> <p>8 waive signature.</p> <p>9 I appreciate it, Mr. Williams.</p> <p>10 We're finished here. I appreciate your time.</p> <p>11 THE WITNESS: All right. Thank you,</p> <p>12 sir.</p> <p>13 MR. STILLMAN: Thank you, Mr. Williams.</p> <p>14 THE WITNESS: Yes.</p> <p>15 MR. MORRISSEY: I don't need a copy of</p> <p>16 this.</p> <p>17 MR. STILLMAN: We are going to order a</p> <p>18 copy.</p> <p>19 (The deposition was</p> <p>20 concluded at 12:32 p.m.)</p> <p>21 (Signature was waived.)</p> <p>22 --oo0oo--</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 54</p> <p>1 CERTIFICATE 2 OF 3 CERTIFIED SHORTHAND REPORTER 4 5 I, DEBRA L. KLESZYK, a Certified Shorthand 6 Reporter of the State of Illinois, CSR License 7 084-002981, do hereby certify: 8 That previous to the commencement of the 9 examination of the aforesaid witness, the witness 10 was duly sworn by me to testify the whole truth 11 concerning the matters herein; 12 That the foregoing deposition transcript 13 was stenographically reported by me and was there- 14 after reduced to typewriting under my personal 15 direction and constitutes, to the best of my 16 ability, a true and accurate record of the 17 testimony given and the proceedings had at the 18 aforesaid deposition; 19 That the said deposition was taken before 20 me remotely via videoconference at the time and 21 place specified; 22 That I am not a relative or employee or 23 attorney or counsel for any of the parties herein, 24 nor a relative or employee of such attorney or 25 counsel for any of the parties hereto, nor am I</p>	
<p style="text-align: right;">Page 55</p> <p>1 interested directly or indirectly in the outcome 2 of this action. 3 IN WITNESS WHEREOF, I do hereunto set my 4 verified digital signature this 7th day of May, 5 2024. 6 7 8  9 DEBRA L. KLESZYK 10 Certified Shorthand Reporter 11 License No. 084-002981 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	

[01851 - appeal]

Page 1

0	2017 14:21	4/22/24 36:6	acknowledge
01851 1:6	2021 12:19	47:2	4:5
084-002981	2023 32:18	4/23 20:2 36:23	acknowledged
54:7 55:9	33:3	50:19 52:13	18:8
1	2024 1:18	4/23/24 36:12	action 55:2
1 3:11 7:2 27:1	40:22 41:13	44:24	actual 10:7
27:3	55:5	42 31:19	42:16,18
10 7:5	22nd 27:25	44 3:6	actually 18:21
10257 2:4	23 23:7 33:2	48 3:5	26:23 41:16
11:16 1:18	230 2:10,10	5	42:8 43:8
11:55 34:2	233-7900 2:5	5 3:5 15:1	ada 9:10 16:10
12 47:24	23rd 28:1 33:8	31:20 40:22	16:12,15 17:7
12/21/23 39:6	33:10 46:17	500 47:6	17:10 30:9
12/22 49:6	24th 46:15	52 3:6	33:12 42:2
12/22/23 40:19	25 1:18	6	44:18 51:3
12/23 39:13	25th 33:9,10	6 30:1	adminis 4:10
12/6/23 35:22	27 3:11	60606 2:11	aforesaid 54:9
12/8 37:18 49:5	2700 1:21	60643 2:4	54:18
12:00 47:23	28 32:16	7	ago 9:1 48:8
12:06 34:3	2:10 44:25	7 30:1,1	52:12
12:17 43:20	50:20	773 2:5	ahead 27:17
12:20 43:21	3	7th 55:4	alfie 7:3,3
12:32 53:20	3 3:13 34:6,8	8	allegations
16 41:12	300-4479 2:11	8 13:24 19:15	11:21 48:6
1875 55:8	31 3:12	31:19	alleged 39:10
1981 7:5	312 2:11	a	42:17
1:00 44:25	34 3:13	a.m. 1:18 34:2	answer 6:7
50:20	3h 31:19	ability 54:16	12:3
1:23 1:6	4	above 1:14	answering 21:2
1:30 47:24	4 47:2	absolutely 6:5	answers 5:25
2	4/22 20:2 36:4	access 26:12	anybody 48:5
2 3:12 31:8,10	36:11	accurate 54:16	anyways 24:6
2/22 20:2	4/22/23 36:10		appeal 40:24
			52:6

[appealed - cermak]

Page 2

appealed 52:4 appeared 2:6 2:13 appears 37:24 appoint 25:12 appointment 10:1 13:10 25:10,15,17 44:15 50:21 51:9,13,14 52:14 appointments 13:4 25:2 26:13 appreciate 48:10 53:1,9 53:10 approximately 44:24 45:24 46:2 47:13,22 47:23 50:19 april 1:18 7:5 36:2 46:17 area 14:9 19:9 19:12 27:6 areas 19:14 arm 21:19,19 21:21,23 arm's 27:10 arms 29:3 asked 16:19 36:15 51:4 52:17 asking 7:23 10:13,16,17	17:5 49:21 assist 15:7 17:8 32:13 assistance 17:6 18:25 23:1,22 25:18 33:13 34:23 36:16,18 39:17 44:13,17 45:10,17 50:24 51:19,22,23 52:17 assistant 47:18 assisted 22:22 32:25 assisting 15:13 32:21 44:18,19 44:21 assume 6:7 attention 37:10 39:10 42:16 attorney 4:12 9:6 54:23,24 attorneys 8:23 available 38:20 avenue 1:21 2:4 avoid 35:8 aware 11:13 17:11,18,21 18:1,9	bailiff 48:2,3 bare 35:10 barely 47:15,16 barrier 51:16 bars 6:22 basement 13:17,24 14:2 14:4 31:24 bathroom 43:13 beginning 23:6 behalf 1:14 2:6 2:13 believe 52:12 bent 47:15 best 54:15 birth 7:4 bit 14:15 19:6 26:24 booking 12:16 12:18 booklet 18:16 braking 52:15 break 6:14 7:19 34:1 43:19 bring 26:25 broken 46:22 47:15 building 20:13 20:14,15 36:11 bullpen 47:13 burn 29:11 35:14 37:12 burning 32:8,9	burns 29:2,11 35:16 39:3 40:15 41:1,4 42:14
			c
			c 2:1 california 1:21 call 6:21,25 7:2 26:23 27:1 34:5 called 4:23 25:8 calling 31:7 canceled 25:10 25:12,17 capacity 28:10 case 1:15 11:14 11:20,20,22 30:25 39:22 50:25 cato 34:19 ccdoc 18:13,15 51:3 ccos 37:25 cell 24:21 25:6 center 1:21 cermak 10:1 13:3,7,14,19,20 13:21 19:10,16 20:11,11,16 21:13,14 23:19 24:9 26:4,14 26:15,18 27:13 27:19 31:5 32:1 38:22 42:17 44:13

[cermak - declaration]

Page 3

45:2,2,4,5,8,12 45:15,18,19,25 46:3,10 49:4 52:13 certificate 54:1 certified 1:15 4:2 54:3,5 55:9 certify 54:7 chair 15:3,8,18 27:21 29:6,8 30:12 35:4,7 35:11 46:22 47:14,19 chairs 16:2 chance 52:6,20 chicago 1:21 2:4,11 civil 1:19 class 1:4 clear 6:3 26:24 clinic 13:10 close 21:15,17 collected 46:13 46:18 50:4 come 48:6 coming 11:10 21:9 commencem... 54:8 commencing 1:18 commentary 49:23 communicated 22:19	communication 12:4 complain 41:6 complained 21:25 complaining 34:22 46:16 47:4 complaint 22:10,12 complaints 22:6 compliance 42:2 computer 30:16 33:20 concerning 54:11 concluded 53:20 conduct 50:19 confusing 24:7 constitutes 54:15 control 35:3 36:21 37:3 38:3,12,17 convicted 12:12 cook 1:7,8,20 9:10 12:15 15:10 coordinator 30:9 48:23	copies 52:25 copy 52:20,22 53:15,18 cord 31:21 correct 9:7 12:9 13:25 14:13 19:7 31:12,21 32:10 35:1,5,11,15 38:8 39:17,24 40:22 41:7 42:2 50:9 51:10,20,25 correctional 1:20 17:23 34:19 correctly 38:11 corridors 13:24 19:7,12,18 counsel 4:8 54:23,25 county 1:8,8,20 4:15 9:10 12:15 15:10 couple 5:20 22:25 48:8,14 49:25 court 1:1 4:1 5:19 11:12,24 11:25 19:1,13 20:12,13,14,15 36:11 46:25 47:1,2,5,12,18 courtroom 46:21,24 47:3	47:5,5,12 cover 40:10,13 crimes 12:12 csr 54:6 cuffed 15:23 16:1 cuffs 16:3 current 12:15 36:25 cut 21:1 cuz 14:12 24:23 49:10 cv 1:6
			d
			d 3:1 dart 1:7 date 7:4 8:24 44:22 50:19 dates 29:25 30:1 day 36:15 45:25 46:4,18 50:9 52:15 55:4 days 8:25 48:8 48:20 52:12 debbie 4:2 debra 1:15 54:5 55:8 december 23:6 23:6,7 30:1 32:21,22 33:3 declara 31:1 declaration 3:12 30:25

[declaration - explaining]

Page 4

31:17 defendants 1:9 1:14 2:13 4:14 denied 16:20 16:23 depo 7:21 deposed 11:14 deposition 1:13 4:5,7,18 5:4 7:16,20,22 11:8,10 27:2 31:9 34:7 53:19 54:12,18 54:19 descending 34:25 description 3:10 destination 26:8 details 11:14 11:19 detainee 10:22 17:20 18:3 25:25 37:24 38:1,21,23 39:2 detoured 25:4 25:6 devore 2:9 4:14 devoreraduns... 2:12 dictate 9:19,22 17:13	different 26:4 26:21 27:12 difficulties 20:8 20:20 22:16,20 23:20 25:16 28:3 39:23 41:7 50:25 difficulty 38:24 digital 55:4 direction 54:15 directly 14:24 29:25 55:1 discussed 19:5 discussion 7:10 30:21 39:5 district 1:1,1 division 1:2 13:24 19:15 31:19 divulging 12:4 doctors 42:18 document 29:22 31:4,12 37:14,15 39:16 39:16 42:20,24 documentation 11:7 documented 30:5,6 33:14 doing 23:3 33:11 door 23:11,13 35:9 doors 46:21,23	doorway 47:13 47:17,20 downward 34:22 35:2,4 drafted 41:18 42:5 due 47:16,16 duly 4:20,24 54:10 e e 2:1,1 3:1 5:15 5:15,16 7:3 ease 38:21 easier 5:18 eastern 1:2 efferson 1:13 3:3 4:22 5:9,15 6:20 31:18 effort 25:8 either 13:10 18:11,25 21:12 48:7 elevators 14:6 employee 54:22 54:24 enlarged 14:25 14:25 15:1 entire 13:1 entitled 1:15 er 13:10 escort 10:4 escorted 44:12 44:15 45:12,15 47:11	escorting 10:3 48:1 essentially 31:17 34:21 eugene 1:4 10:23,25 eventually 24:23 evidence 40:3 exact 8:24 exactly 42:12 42:13 examination 3:4 5:1 44:1 48:12 52:9 54:9 examined 4:24 excuse 14:25 exhibit 3:10,11 3:12,13 27:1,3 31:8,10 34:6,6 34:8 exhibits 3:9 exiting 47:17 experience 32:3 experienced 29:1 32:8 52:11 explain 14:15 31:1 explained 29:17 explaining 11:24
--	--	--	--

[explicit - happened]

Page 5

explicit 22:20	foregoing 54:12	going 5:19 6:7 8:7 11:9,12 12:22 13:23 18:25,25 19:22 20:10,12,21,21 20:23 21:9 22:23 24:5 25:2,24 26:3 26:22,22,23,25 26:25 28:10 34:24,25 36:18 36:20 37:4 43:10 44:4,17 45:1,8,17,19,20 45:21 46:21,24 47:1 49:13 53:17	49:12 50:4,16 50:17 52:3,21 grievances 8:18 34:15 48:7,17 grieved 32:24 guard's 34:23 guess 6:11 14:4 15:21 21:13 40:10
f	forget 42:9 forgot 16:15 form 23:24 28:19 found 24:11 30:3 foundation 40:7 four 8:25 48:20 frequently 15:9 full 5:7 22:21 further 48:10 52:7	good 43:23 53:6 gotten 23:22 24:25 29:19 government 6:21 great 35:8 grievance 3:13 8:9,9,10,13,15 10:21 16:24 17:2 18:7 22:4 23:4 32:23 33:11 34:10,18 35:25 42:6 44:4,22 45:1,6 45:14 46:13 47:7,8,21,25 48:24 49:1,3	h
f 5:15,15 7:3 fact 49:20 falling 32:5 familiar 11:2 19:6,11,13,14 far 11:16 25:22 31:21 fast 43:5 49:25 federal 1:19 feet 46:6 felt 17:9 figure 6:14 9:23 filed 18:7 36:2 44:4 48:7 filing 34:18 finally 39:9,14 finish 21:4 49:25 finished 43:2 53:10 first 4:24 5:21 12:14,17 13:21 19:24 50:16,17 five 48:20 floor 14:3,12 focus 21:12 following 46:18 follows 4:25 forbid 18:10 forced 35:9 47:16,19	g g 2:3 gates 46:24 gesturing 6:2 getting 22:16 24:21 25:1,24 33:12 give 18:16 given 5:4 54:17 gliding 38:21 gloves 29:7 go 5:19 6:18 13:9,10 14:1 20:24 23:12,12 25:2,6 27:15 27:15,17,18,18 30:19 33:25 43:7,13 46:10 49:16 50:15	half 9:3,4 hallways 19:7 19:12,19 hand 21:20,22 21:22 42:14 48:24 handcuffs 15:22 handrail 21:23 22:1,13 handrails 21:12,14 23:10 27:9 hands 29:3,7,9 29:21 30:6,7 32:8,9 35:10 35:14 39:3,5 40:15 41:1,4 42:11,17 52:15 handwriting 34:12 happen 8:23 23:12 happened 44:23,24 45:14	

[happened - lot]

Page 6

46:17 47:19 hard 44:9 hardship 32:3 healed 39:4 health 39:11 hear 42:4 heard 11:4,6 held 7:10 30:21 help 24:17,22 34:24,24 36:13 36:13 37:4 44:19 45:7 helping 33:4 hereto 54:25 hereunto 55:3 history 14:16 hit 23:14 hold 20:25,25 53:5 hour 9:3,5 45:25 46:2 housed 12:8,25 housing 46:11 hurt 52:15	index 3:9 indicate 4:9 indirectly 55:1 individual 11:19 individually 1:4 informed 19:3 injured 28:9 injuries 28:25 29:4 42:17 injury 14:23 29:15 31:21 35:8 inmate 9:11 15:15 17:15,22 17:23 18:3 30:12 inmates 9:19 9:25 15:17 insisting 41:5 instance 16:22 interested 55:1 involved 40:4 ish 12:22 issue 21:25 22:1 issues 23:9,15 25:11 36:9	31:25 37:21 january 40:22 41:12 journey 24:15 35:4	late 23:5,5,5,6 23:7 32:21 33:2 lawyer 8:3 11:11,11 led 14:4 51:3 left 21:22 letter 11:24 letting 41:2 license 54:6 55:9 listing 44:20 little 12:22 14:15 19:5 26:24 49:19 llc 2:9 located 1:20 location 17:14 long 31:23 45:24 48:16,23 longer 9:2 look 7:24 8:19 42:10 49:16 looked 8:5,8,9 8:12,16 29:21 30:3,8,9 37:13 37:13,14 42:20 looking 49:3 lose 38:3,12,17 lost 35:3 36:21 37:3 lot 17:5 29:24 30:2 41:3
i	j	k	
idea 19:2 40:9 identify 4:8 illinois 1:1,8,17 1:22 2:4,11 4:2 54:6 incarcerated 31:19 incidence 35:20 including 31:25	jail 6:24,25 9:10,12,19 10:8 12:15 15:3 17:12,19 18:2,25 30:11	keep 8:6 kept 25:1,23 51:12 kind 6:1 9:18 16:4 19:5 24:6 25:25 28:25 29:14,15 31:4 31:16 44:9 49:25 kleszyk 1:15 4:2 54:5 55:8 knew 51:4 know 6:5,14 8:24 9:24,25 10:8,22,24 11:1,5,19,22,23 14:5 16:23 18:19,24 19:10 22:20 23:10,15 24:11 41:2,4 41:16,17,17,20 42:1 46:3 48:3 48:4 49:15,20 known 17:9	
		l	
		l 1:15 5:16,16 5:17,17 7:3 54:5 55:8	

[m - officers]

Page 7

m	mentioned 44:3 52:12	movement 9:19 9:20	november 32:16 33:2
m 5:17	ments 25:13 26:13	moving 15:2 32:4	number 12:16 12:18,19
made 8:1 11:21 15:1 22:6 23:21,25 24:9 24:10,14 26:7 51:8,9	mid 25:15	multiple 8:17	o
make 5:18 16:14 50:2,7	middle 28:5	n	o 5:15
making 22:21	midway 36:19 36:19 51:6	n 2:1 3:1 5:15 5:16	o'clock 47:24
mandate 18:10	mine 16:11	name 4:1,16 5:7,9,12 6:21 11:4,6 16:15 16:16,16 17:8 31:18 33:12,15 42:13 48:4	oath 4:10
manual 18:13 18:14,15	minor 15:9 44:16 45:17	narrow 46:24	object 28:19
marked 27:3 31:10 34:8	minute 7:9 49:20	navigating 32:6	objection 23:24 23:25 28:13,15 28:18 40:6
marks 35:14	minutes 47:14	names 6:18	objections 4:10 4:15
married 7:6	mis 31:18	need 6:14 20:24 25:2 49:22 53:15	occasion 28:2 32:4 41:16 42:11
matter 52:11	mistaken 49:11	needs 13:4	occasions 48:16
matters 54:11	misunderstood 37:25	never 11:5,25 16:17 18:4 24:19,19,25 25:1,4,5,7,7,23 32:24,24 42:16	occurred 29:5 47:22
mean 6:20 9:23 16:12 17:5,7 17:22 20:2 21:18 24:11,25 25:7 26:6 27:22 32:22 33:7 47:18	monroe 2:10	new 50:17	october 12:20
medical 13:4 14:16 25:10,12 25:15 29:15 37:9 39:10 42:18 52:14,17	month 13:12,12 33:5	normal 50:8	offer 15:19,20
meeting 8:22	months 22:25	northern 1:1	office 48:5
members 37:24	morrissey 2:3,3 3:6 4:16,17 8:4 12:1 20:25 21:4 23:24 28:13,15,19,22 33:21 40:6 43:10,16,22 44:2 52:10 53:7,15	notice 11:9	officer 10:2,4 13:15 15:16 16:19 17:15,23 18:5,10,11 22:22 33:22,23 36:12 38:23 39:23 42:2 44:16,16 45:15 47:25 51:19,24
mention 45:1,7	morrisseylaw... 2:5	noticed 20:10	officer's 48:4
	moved 10:1	noticing 4:11	officers 16:8,23 17:5 34:19
		notified 16:14	

[officers - pwm]

Page 8

36:15 37:25 50:24 oh 17:3 20:12 30:19 36:22,24 45:20 46:7 ointment 42:23 okay 5:3 10:22 12:5,25 17:3 17:11 20:23 21:3,11,24 23:8 26:2 28:21 33:1,18 34:21 36:5 40:1,16 41:9 42:22 43:12,14 43:18 46:25 48:14 49:2,15 50:14 51:2 52:24 old 31:19 once 18:7,7 20:22 ones 27:9 oo0oo 53:22 opposed 24:21 25:17 order 53:17 orders 19:13 original 41:10 52:22,25 outcome 55:1 overlapping 5:24	p p 2:1,1 p.m. 34:3 43:20 43:21 44:25 50:20,20 53:20 page 3:4,10 painful 35:15 palms 35:14 pardon 30:15 part 28:5 29:8 participating 4:4 parties 4:4 54:23,25 partway 24:12 51:24 party 17:16 pat 4:17 6:13 9:6 28:17 43:9 50:18 patrick 2:3 people 15:13 40:3 person 35:9 44:18 personal 54:14 personally 9:9 9:17 10:14,18 photo 26:23,25 photograph 3:11 physically 4:5 10:15 picked 35:7	place 54:21 places 31:25 plaintiff 1:5 2:7 please 5:7 6:5 7:20 podiatrist 46:7 46:8,8,10 50:21 51:9,13 52:13 podiatry 51:13 podometry 46:5 policies 9:10,18 10:7,10,19 17:12,18 18:1 18:9 policy 18:19 38:1 posed 51:16 preparation 8:20 prepare 7:15 7:17,24 present 4:6 pretty 35:23 prevent 17:20 previous 54:8 prior 16:17 22:24 privileged 12:3 12:4 probably 8:25 9:4,4 13:11 15:11 21:20 33:5 40:10	42:15 48:4,19 48:20 procedure 1:19 18:19 procedures 9:11,18 10:7 10:19 17:12,19 18:2 proceeded 9:13 proceedings 47:14 54:17 processed 12:14,17 prompt 50:11 propel 15:3 protocols 17:10 17:10 provided 44:16 pursuant 1:18 push 15:4,5,17 15:24 16:2,20 17:23 18:3,6 24:18,23 30:12 39:15 51:5 pushed 16:8,18 28:8 38:1 pushing 15:8 17:13,16,20 51:7 put 10:20 15:22 23:4 26:22 29:9 32:23 40:2 48:2 pwm 2:5
---	---	---	---

[question - restarted]

Page 9

q	45:18,21 49:4 50:20 51:16	receiving 25:17 25:23 37:4,20 37:20 38:5 44:19	remszik 34:19 34:20,20
question 6:8 24:6 26:10 28:20	ramps 13:22 19:6,12,18 20:3,6,7,9,12 20:19 22:24 26:17,21 31:5 34:16,23 39:15 44:20,21	recent 35:23 recognize 19:18 27:5 34:10,15	rephrase 6:6 replied 48:22 reply 48:21 report 29:20,22 39:3
questions 5:25 6:5 7:23 12:3 43:11 50:1 52:8 53:2	ran 38:3 rare 32:12 reach 21:19,19 21:21 27:10	record 5:8,10 6:3 7:8,11,13 30:20,22 33:25 54:16	reported 54:13 reporter 1:16 4:1,3 5:19 54:3 54:6 55:9
quoted 48:24	read 38:4 40:24 41:1 44:9,21 47:8,20 52:6	refrain 6:2 refusals 39:16 39:18	request 16:9,10 16:13 39:10,12
r	reading 38:11 real 43:4 reason 46:9 reasonable 50:8	refuse 24:17 refused 36:13 50:25	requesting 50:23
r 2:1 5:15,16 radunsky 2:9 4:14 rail 21:23 ramp 11:16,18 11:25 13:18,19 13:20,21,21 19:1,1 20:15 20:16,21 21:7 21:8,8,13,14 22:17,21 23:9 23:12,13,20 24:9,9 25:3,9 25:20 26:1,5 26:13,14,15,18 26:18 27:5,8 27:12,13,15,20 27:24,24 28:6 28:6,12 30:25 31:23 32:4,6 32:10,13 33:13 34:25 36:8,12 36:19 38:1,2 44:5,13,14,17 44:18 45:11,11	recall 6:11,12 8:25 18:20 20:3,6 21:11 21:13 23:8 25:21 26:11 32:5 50:23 receive 11:7 41:12 51:18,23 received 34:24 34:24 37:17 40:21 44:13 45:10,10 49:4 52:3	regarding 9:11 10:8 48:6 relation 11:8 relative 54:22 54:24 remember 18:22,23 25:22 30:24 31:3,3 35:19 37:20 38:5 41:15 48:16 remind 12:2 reminded 39:15 remotely 1:17 4:7,11 54:20	represent 4:17 4:18 request 16:9,10 16:13 39:10,12 requesting 50:23 require 34:23 respond 24:1,2 24:7 28:16,22 40:8 48:17 49:13,13,14 50:11,12 responded 50:3 50:9 response 33:14 37:21,22 38:6 40:2,19 41:10 41:18,20 42:5 49:5,17 52:3,5 rest 24:15 restart 30:14 restarted 30:17

[result - spell]

Page 10

result 22:9 25:3 returned 24:21 returning 47:17 reviewed 9:9 9:17 10:6,14 10:18 reviewing 37:23 40:3 reword 17:25 24:6 right 5:6 6:17 7:12,21,22 8:6 11:15 12:15 13:17 15:24 16:1,3 18:23 21:22 23:13 24:22 26:1,8 30:24 32:1,6 32:16,21 33:4 34:5 35:23 37:18 38:10,14 38:18 39:7 41:10,15 42:12 42:12,13 43:6 45:21 49:2,18 50:5,12,12 52:4,7,19 53:1 53:5,7,11 room 4:6 rtu 12:8 13:1 13:17,18,20,20 13:24 14:8 19:7,11 20:4,7 20:11 26:5,14	26:18 27:8,13 31:5,24 44:15 45:3,15,19,21 rubbing 29:12 rules 1:19 5:20 17:12,19 18:2 run 38:12 s s 2:1 5:15,17 sabrina 19:4 41:25 42:3 44:19 saying 11:17 17:21 18:18 19:8 25:5,5 27:10,13 30:4 30:14,16 33:17 33:19,20 35:2 37:23 39:18 says 37:18 38:16,19,20,25 39:2,9,13,14 45:9 scratch 42:8 scratched 47:16 screen 36:25 44:8 second 14:3 26:24 30:20 see 10:11 24:24 35:17 44:8,9 46:5,10 seem 50:8	seen 10:15 18:4 28:7 51:6 send 52:20,24 52:24 sense 50:2,7 sent 30:17 september 12:20 service 39:11 services 25:24 set 55:3 sheriff 1:7 4:14 sheriff's 48:5 shorter 9:2 shorthand 1:16 4:3 54:3,5 55:9 shortly 32:20 33:1 shot 14:19,20 14:22,24 show 41:19 44:8 48:25 49:11 showed 33:19 showing 40:14 shown 35:16 shows 38:20 41:24 shut 33:16,17 sic 37:25 38:2 44:20 46:5 signature 31:14 53:8,21 55:4,8 signed 32:15 46:14	signing 30:25 31:4 similar 45:14 sir 15:25 43:15 48:9 51:11,15 51:17 52:25 53:12 situation 11:24 36:11 40:14 slamming 35:8 social 46:14,18 software 30:17 somewhat 50:11 sorry 5:15 8:4 9:15 16:25 27:17 28:17 36:10,22,22,25 42:7 43:1,14 sort 14:2 sought 29:14 sound 49:2 sounds 49:17 south 1:21 2:4 speak 5:22 48:6 speaking 5:22 37:23 40:3 specific 14:23 20:7 35:19 specifically 20:4 22:13 specified 54:21 speed 35:7 spell 5:7,10,12 5:13
--	--	--	--

[spinal - told]

Page 11

spinal 31:20 spine 14:25 15:1 spoken 8:6 spot 22:10 staff 30:11 32:13 37:24 39:14 41:4,7 51:3 stand 41:10 standards 9:10 start 5:6 started 22:23 23:2,3,5 28:7 32:20 33:4 51:7 starting 4:11 state 1:16 5:7 54:6 statements 31:4 states 1:1 steep 21:8 31:23 steepness 23:10 28:6 stenographic... 54:13 stillman 2:10 3:5 4:13,13 5:2 7:8,12,14 8:11 12:7 21:1,3,10 24:4 27:4 28:17,21,24 30:19,23 31:11	33:23 34:4,9 40:12 43:8,12 43:23 48:13 53:4,13,17 stipulate 4:19 stipulation 4:9 stop 20:23 29:6 29:6,9 35:10 street 2:10 strike 23:18 stroger 20:24 stroger's 20:22 21:7,9 struggle 24:16 struggled 23:23 24:20 struggling 24:12,24 25:9 28:8 51:6,20 stuck 46:22 47:12 stuff 41:3 subject 36:7 subpoena 11:8 11:23,25 suite 2:10 summarize 31:16 suppose 8:21 8:21 supposed 17:8 17:22 18:24 sure 8:1 16:14 surprised 42:4	sworn 4:21,24 54:10 t t 15:1 31:20 take 13:14,18 13:20 14:6,11 26:2,3,4,4 taken 1:14,17 13:13 26:6 34:1 43:19 54:19 talk 7:24 talked 8:2 12:2 talking 26:16 36:1,23 50:18 tell 31:17 38:10 38:23 39:22,25 52:14 telling 41:6 49:12 ten 12:11 15:11 15:13 47:13 tend 15:3 16:3 tered 4:11 testified 4:25 testify 54:10 testifying 31:18 testimony 54:17 thank 53:11,13 thing 45:14 46:6,17 things 5:18 12:2	think 8:21 11:5 14:2,3 18:13 18:21 20:19 21:2 27:7 28:6 40:1 41:23,23 48:19,21 49:9 49:10 53:4,5 thinking 51:3 third 6:4 14:12 thomas 1:7 2:3 thompson 36:13 44:16 thought 36:22 three 8:25 12:22,22 13:11 19:23 tier 31:19 51:10 time 4:8 13:1,9 19:25 23:20 38:2,11,15,16 38:22 44:20,21 47:21 48:11 49:18 53:10 54:20 times 13:12 15:10,14 23:23 29:24 30:2 tion 31:2 tires 35:10 title 16:16 today 7:16,23 11:10,12 20:1 33:7 told 11:11 18:24 30:11
---	---	---	---

[told - williams]

Page 12

49:3 took 48:16,18 48:20,23 49:18 49:19,20 touch 21:22 transcript 5:24 54:12 transfer 25:16 transport 9:11 13:15,16 25:15 transportation 9:25 26:3 transported 17:6 19:10,15 transporting 17:14 travel 31:25 traversed 23:19 27:20,22 traversing 20:5 32:9,13 treat 26:12 treated 26:11 29:19 treatment 25:25 29:15 trip 45:2 trouble 20:16 troubles 23:22 true 54:16 truly 23:23 truth 41:6 54:10 try 5:21 6:1,6 6:11	trying 9:23 29:6 tunnel 14:9,11 tunnels 13:23 38:22 turned 24:20 twice 13:12 two 20:9 22:24 22:25,25 26:17 26:20 37:25 42:15 46:1 48:7 types 10:19 36:9 typewriting 54:14	43:4 used 23:17,18 31:24 using 21:22 usually 15:24 50:15	wanting 15:22 washroom 42:25 43:4,7 way 22:21 23:21 26:7,11 37:7 45:4,21 51:13,14 ways 51:19 we've 8:6 12:2 week 48:19,20 weeks 42:15 went 8:3,10 13:8 29:20 46:3 47:2 52:13 west 2:10 20:11 western 2:4 westmoreland 1:4 4:17 10:23 10:25 wheel 29:10 47:15 wheelchair 14:13,17,18 27:24 31:20 32:5 38:3,12 38:17 39:4 47:12 wheelchairs 39:15 wheeling 38:24 wheels 29:12 whereof 55:3 williams 1:13 3:3 4:18,22 5:3
	u	v	
	ultimate 51:21 ultimately 23:22 24:14,20 41:9 51:18 under 12:15,18 12:19,22 19:14 20:3,7 54:14 understand 6:4 6:6 understanding 16:6 understood 6:8 unit 46:11 united 1:1 upward 34:22 use 21:16,18,20 21:21 31:20 35:10 42:25	v 1:6 validity 4:10 various 31:25 verbal 6:1 22:9 22:12 verbally 22:8 39:11 verified 55:4 video 38:20 41:3 videoconfere... 1:17 2:6,13 54:20 vividly 18:23	
		w	
		w 2:3 5:17 wait 5:23 33:14 waiting 49:9 waive 4:9,15 53:8 waived 53:21 wall 35:9 38:13 walls 10:16 want 12:2 24:5 36:13 52:22 wanted 48:25	

[williams - zstillman]

Page 13

5:9,16 6:20 8:4 12:1 21:5 24:1 27:2 31:9,18 33:22 34:7 37:24 38:21,23 39:2 43:17 44:3,10,23 48:11,15 49:22 52:20 53:9,13	yeah 5:14 6:16 6:25 11:2,18 14:1,11 16:2 17:25 19:1,23 23:6,11 25:7 33:5,23 36:3 37:3 39:12 41:22 43:7,23 46:2 49:19
witness 1:20 3:3 4:6,20,23 8:8 12:6 21:6 24:2 28:14,23 40:9 43:14,18 53:11,14 54:9 54:9 55:3	years 12:11,22 12:23 19:23 22:25 31:19
word 7:19	yep 53:6
worker 46:14 46:19	yesterday 50:4
wounds 39:4,5 39:11	z
write 33:11	zach 53:2
written 10:7,9 10:10,11 39:11	zachary 2:10 4:13
wrong 30:4	zstillman 2:12
wrote 16:24,25 17:2 49:1	
x	
x 3:1	
y	
y 5:16 yarnell 1:13 4:22 5:9,16	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.